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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.  
 FRAWLEY IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF PLAINTIFFS' MOTION  
 TO FILE SURREPLY IN OPPOSITION  
 TO GOOGLE'S MOTION TO DISMISS  
 THIRD AMENDED COMPLAINT**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Date: October 28, 2021  
 Time: 1:30 p.m.

**DECLARATION OF ALEXANDER P. FRAWLEY**

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' Administrative Motion to Seal Portions of Plaintiffs' Motion for Leave to File Surreply in Opposition to Google's Motion to Dismiss the Third Amended Complaint (the "Motion to file a Surreply"). The Motion to File a Surreply references material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

3. Plaintiffs respectfully request that the Court seal the redacted portions of the Motion to File a Surreply and supporting papers, attached as Exhibit A to the Administrative Motion to Seal, including (i) portions of the Motion to File a Surreply, (ii) portions of the [Proposed] Surreply In Opposition to Google's Motion to Dismiss Third Amended Complaint, (iii), portions of the Declaration of Mark Mao in Support of Plaintiffs' Motion to file a Surreply ("Mao Decl."), and (iv) the entirety of Exhibits AA, BB, and CC to the Mao Decl.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on October 18, 2021. A Proof of Service is filed concurrently herewith.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of October, 2021, at New York, New York.

/s/ Alexander P. Frawley